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Attorneys for Defendant KINROSS
GOLD U.S.A., INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CORY ELLINGS, Individually and On Behalf
of Others Similarly Situated,

Plaintiff

v.

KINROSS GOLD U.S.A., INC.,

Defendant.

Case Number
2:25-cv-00098-RFB-EJY

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANT KINROSS
GOLD U.S.A., INC. TO FILE ITS
RESPONSIVE PLEADING TO
PLAINTIFF’S ORIGINAL CLASS AND
COLLECTIVE ACTION COMPLAINT
(First Request)**

COMES NOW, pursuant to LR IA 6-1, Plaintiff Cory Ellings (“Plaintiff”) and Defendant Kinross Gold U.S.A., Inc. (“Defendant”), by and through their respective undersigned counsel of record, hereby stipulate and agree that the responsive pleading deadline for Defendant, which is currently set for February 14, 2025, be extended until March 12, 2025. This extension is needed to permit counsel for Defendant to investigate Plaintiff’s claims, prepare a responsive pleading, and continue discussions with counsel for Plaintiff concerning streamlining the litigation and attending a possible early mediation. Additionally, Defendant contends that the proper defendant in this lawsuit is Round Mountain Gold Corporation, which is Plaintiff’s employer. The Parties have agreed to conduct regular conferrals during the extension period.

This is the Parties' first stipulation for an extension for Defendant to respond to Plaintiff's complaint. Counsel for Defendant prepared this Stipulation with the consent of counsel for Plaintiff after a video conference conferral via Microsoft Teams on February 10, 2025. This Stipulation is made in good faith and not for the purposes of delay.

Date: February 13, 2025

Respectfully submitted,

JOSEPHSON DUNLAP, PLLC

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*Attorneys for Defendant Kinross Gold
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IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: February 13, 2025